

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
HANDOKO ATMODJO	:	VIOLATIONS:
	:	18 U.S.C. § 2342(a) (trafficking in contraband cigarettes - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant HANDOKO ATMODJO owned and operated the Indonesia Store, located at 1701 South Bancroft Street, Philadelphia, Pennsylvania.
2. At the Indonesia Store, defendant HANDOKO ATMODJO purchased, distributed, and sold both Indonesian and domestic cigarettes in packs that did not bear the required state stamp tax of the Commonwealth of Pennsylvania. Instead, the packs of cigarettes purchased, distributed, and sold by defendant ATMODJO bore no tax stamp of any kind, the state tax stamp from the state of Delaware, or counterfeit Virginia state tax stamps.
3. Defendant HANDOKO ATMODJO purchased, distributed, and sold more than 60,000 cigarettes that bore no evidence of the payment of Pennsylvania taxes by way of the required state tax stamp, thereby avoiding the tax payment of approximately \$4,050.

4. Defendant HANDOKO ATMODJO did not have permit to import into the United States Indonesian cigarettes, and obtained a license to sell cigarettes in the Commonwealth of Pennsylvania on or about May 14, 2004.

5. Even after obtaining a state license, defendant HANDOKO ATMODJO continued to purchase, distribute, and sell contraband cigarettes.

6. From in or about July 2003 to on or about June 14, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

HANDOKO ATMODJO

knowingly shipped, transported, received, possessed, sold, distributed, and purchased, and aided and abetted the shipment, transportation, receipt, possession, sale, distribution and purchase of contraband cigarettes.

All in violation of Title 18, United States Code, Sections 2342(a) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 2342(a), set forth in Count One of this information, defendant

HANDOKO ATMODJO

shall forfeit to the United States of America any property constituting, or derived from, proceeds traceable to the violation of Title 18, United States Code, Section 2342(a) as charged in this information, including, but not limited to, the sum of approximately \$35,833.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY